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FILED

OCT 21 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) NO. 13-CR-93 JST
14)
15) STIPULATION AND ~~PROPOSED~~ ORDER
16) REGARDING RULE 15 DEPOSITION OF G.M.
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The parties stipulate and agree as follows:

1. G.M. is a witness who the government anticipates will testify regarding the events of the January 18, 2013, alleged in the Indictment.
2. G.M. resides in Lake County in the Northern District of California. She is not able to travel to San Francisco to testify at the trial, scheduled to begin at the earliest on April 13, 2015, for medical reasons set forth more fully in the attached Declaration of Special Agent Megan Long.
3. The parties agree that a deposition of G.M. is appropriate pursuant to Fed. R. Crim. P. 15(a). The United States will make arrangements for G.M.'s deposition to be taken here in the federal building in San Francisco. The parties, in consultation with the U.S. Marshal's and the witness, have

1 agreed on October 29, 2014, following the hearing in the instant matter. Giglio/Brady/Jencks material
2 pertaining to this witness has already been provided to defense counsel.

3 4. The defendant and standby counsel may be present at the deposition and have the
4 opportunity to cross-examine the witness.

5 5. The parties agree that G.M.'s deposition testimony may be offered in evidence pursuant
6 to Rule 15 and that admissibility of particular answers will be subject to the Federal Rules of Evidence,
7 as provided by Rule 15(f). The parties further agree that all substantive objections will be preserved and
8 need not be asserted during the deposition; all objections as to form of question must be asserted during
9 the deposition or will be waived.

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DATED: October 8, 2014

Respectfully submitted,

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MELINDA HAAG
United States Attorney

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/s/
KATHRYN HAUN
WILLIAM FRENTZEN
Assistant United States Attorneys

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/s/
RICHARD MAZER, Esq.
Standby Counsel for Pro Se Defendant

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED: (0 21 14)

JON S. TIGAR
United States District Judge